
**HISTORIC PRESERVATION REVIEW BOARD
STAFF REPORT AND RECOMMENDATION**

Landmark/District: **Walter Reed Army Medical Center Historic District** (x) Agenda
Address: **6900 Georgia Avenue NW**

Meeting Date: **April 26, 2018** (x) Razes
Case Numbers: **18-308, 18-353 and 18-354** (x) Permits

The applicant, EHT Traceries, agent for the long-term lessee and developer TPWR Developer LLC (a joint venture of Hines-Urban Atlantic-Triden), requests the Board's review of permits to raze three buildings—31, 38 and 84—that are identified as contributing to the character of the historic district.

Background

In 2014, the Board designated the entirety of the former Walter Reed Army Medical Center a District of Columbia historic district. The same year, the property was listed in the National Register of Historic Places.

Walter Reed Army Medical Center, then consisting of little more than the core of today's Building 1, was established in 1909. It was intended ultimately to combine on a single campus an Army general hospital, the Army Medical School, the Army Medical Museum, and the Surgeon General's Library, and pathology research facilities. The hospital function grew rapidly with the coming of the World Wars, but it was not until the mid-1950s that all these functions had been united on the installation. Thus, the property's period of significance was established as 1909 to 1956. The list of contributing buildings from that period was intended to include the array of treatment and administrative buildings, research and teaching buildings, dormitories, laboratories and support buildings that made up the whole.

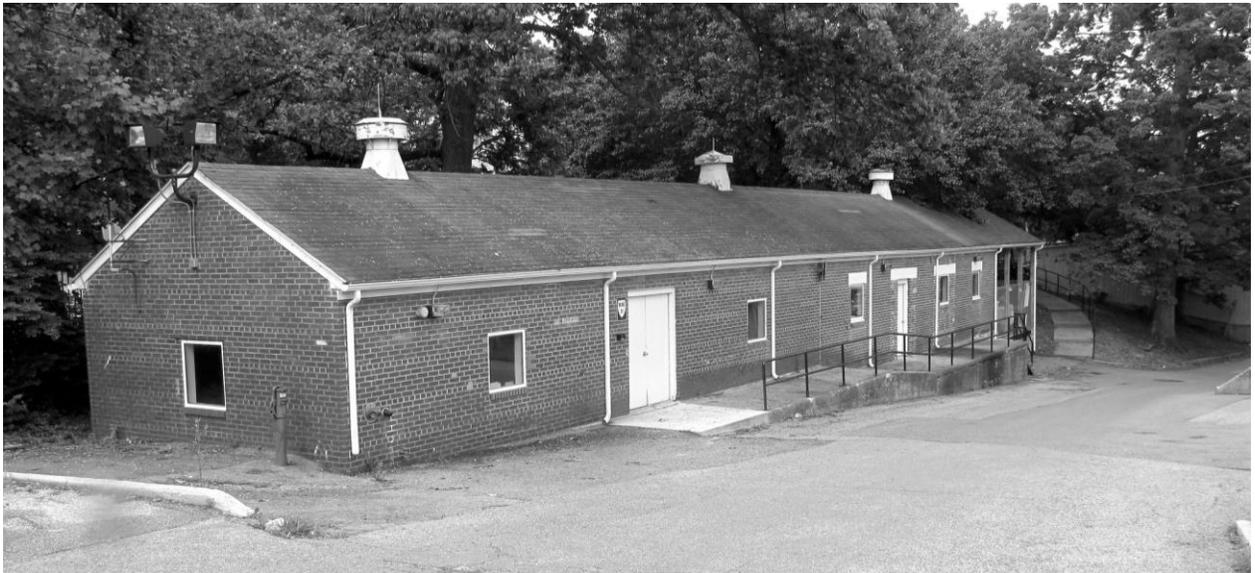
The historic district nomination was prompted by the closure of the base, and a public consultation on the topic of the closure and its preservation implications carefully considered the significance and integrity of the campus as a whole and of the individual structures. For instance, one building dating within the period of significance was determined noncontributing for lack of sufficient historic integrity.

The three buildings presently proposed for demolition are not the largest, most prominent or most significant of the contributing buildings, but each was determined by the Board to contribute in its own way to the character and story of the historic district.

Building 38 (see photo next page) stands south of Dahlia Street, facing east. It was constructed in 1922 as the base guardhouse. It received a second story and wings in 1942, with the wartime expansion of the installation, and was then converted to office use.



Building 31 stands just north of the campus's southern boundary, facing north. This separate, ventilated, brick building was erected in 1921 for the storage of automotive and "medical" oils. It, too, was extended, in 1941.



Building 84 (see next page) is a neighbor of Building 31 and is also related to transportation and to the World War II-era expansion, as it was built as a wagon shed in 1942. It, the post service station, and other structures replaced the *circa* 1910 Building 6, which once housed both wagons and automobiles.



The demolition of Buildings 31, 38 and 84 was first proposed in the 2012 draft small-area plan for Walter Reed. The Board has no authority to approve or deny small-area plans or campus master plans, but it reviews them for the purpose of anticipating future preservation issues. The September 2012 HPO report pointed out that:

Demolition of the buildings would be contrary to the purposes of the preservation law and would require the approval of each project of special merit to replace them. As such demolitions are dependent upon the specifics of the project and will not be likely be proposed in the initial phases of development, the Board and the Mayor's Agent will later have a better opportunity to evaluate the success of the redevelopment and the necessity for such actions.

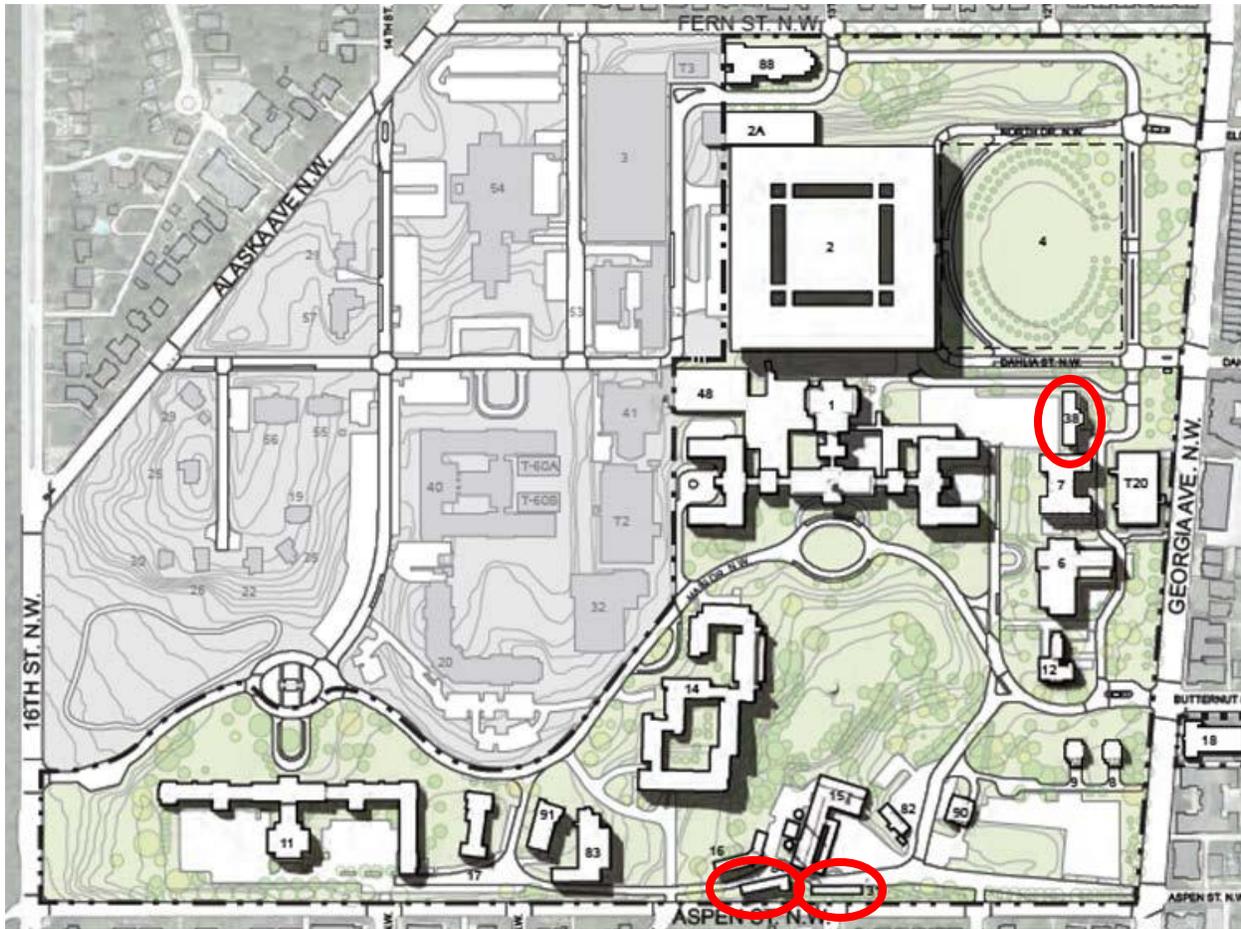
Similarly, the Board reviewed the applicant's draft campus master plan in October 2015 and found that,

razing Buildings 31, 38 and 84 is contrary to the purposes of the preservation law, because demolition would fail to retain and enhance three contributing buildings. It recommended that, if the applicant intends to proceed to the Mayor's Agent, the applicant develop specific special-merit projects for the reuse of those building sites.

Evaluation

Razing contributing buildings fails to retain and enhance them or to adapt them to new uses, and is therefore contrary to the purposes of the preservation law (D.C. Official Code § 6-1101(b)(1)(A)). Their removal would harm the integrity of the historic district. Sanitizing the property of its utility buildings diminishes our understanding if the development and use of the

site. Unless there were a compelling reason for the reassessment and categorization of these three buildings as “noncontributing,” the Board would have to recommend against demolition as inconsistent with the law’s purposes.



The Mayor’s Agent

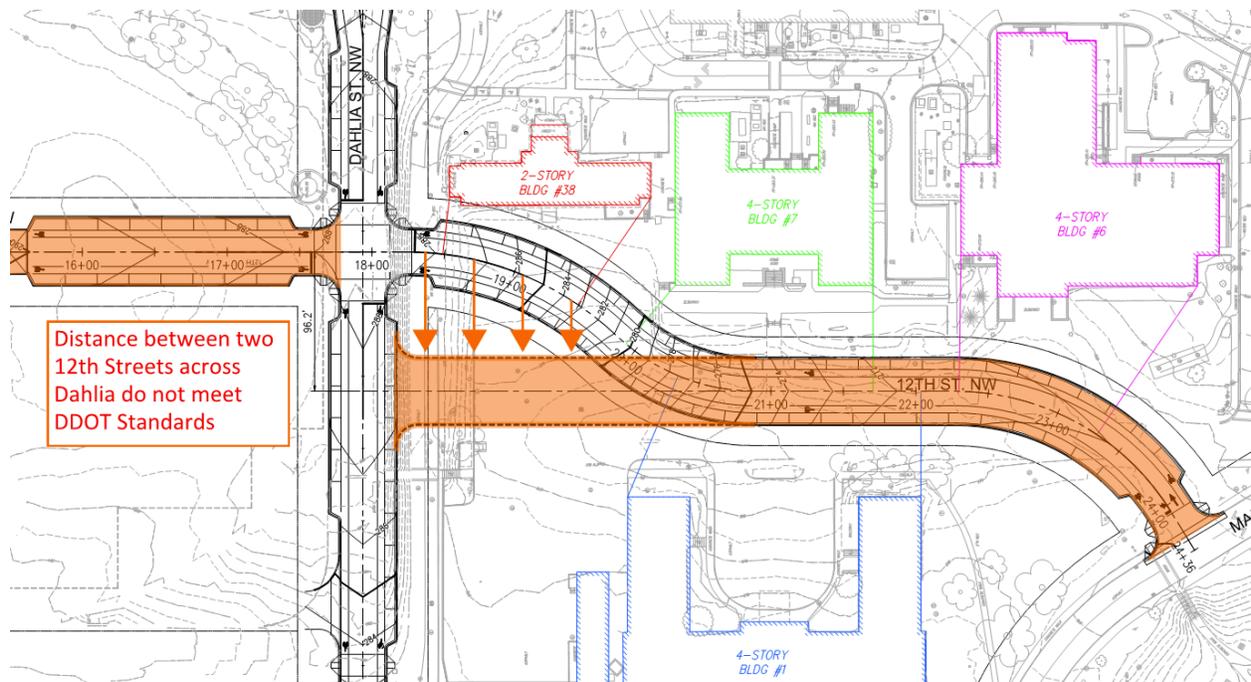
Following a recommendation against razing all or any of the subject buildings, the applicant may request a hearing of the Mayor’s Agent to consider the question. There are three grounds upon which the Mayor’s Agent may order an outcome different from that recommended by the Board. First, the Mayor’s Agent may find that the Board was simply incorrect—that something recommended for denial is, in fact, consistent and compatible. Of course, the Mayor’s Agent has tended to give deference to the Board as the appointed expert body on preservation. Second, the Mayor’s Agent may find that the failure to issue a permit will result in unreasonable economic hardship to the owner, a term that is narrowly defined in the law. Third, the Mayor’s Agent may find that incompatible alteration, demolition, subdivision or new construction is necessary for the construction of a project of special merit. This is the claim most often made in Mayor’s Agent’s proceedings, and the one that most often prevails.

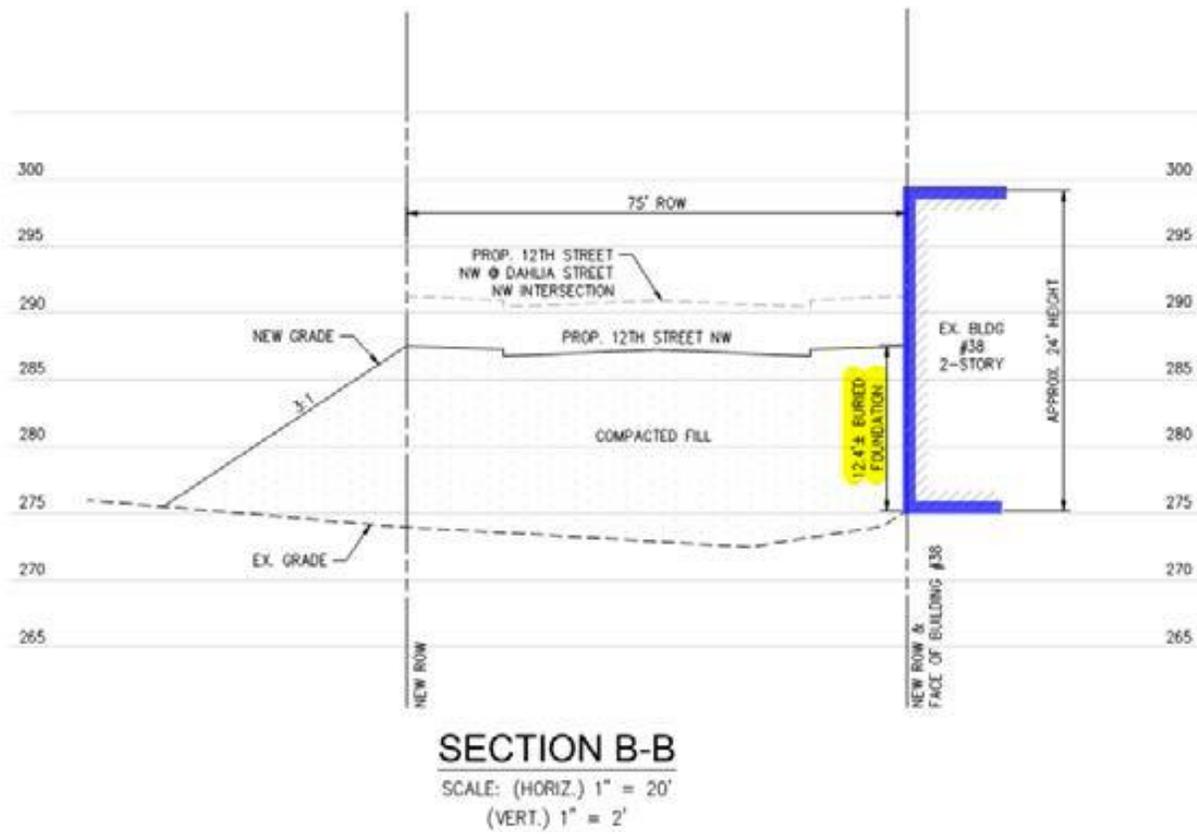
The preservation law defines special merit as “a plan or building having significant benefits to the District of Columbia or to the community by virtue of exemplary architecture, specific

features of land planning, or social or other benefits having a high priority for community services.” (D.C. Official Code § 6-1102(a)(11)) The Board has no role in assessing “social or other benefits,” but its review of buildings and site plans touches upon the qualities of architecture and the features of land-use planning. The Mayor’s Agent’s hearing is a *de novo* review, because the Mayor’s Agent can consider matters beyond compatibility. Yet, the Mayor’s Agent may rely upon the record of a Board hearing to inform his decision. The evidence presented is useful for the inquiry into the question of whether a special-merit project is *necessary*, i.e., whether the project has feasible alternatives that could avoid serious adverse effects. But first, of course, there must be an actual project that may necessitate such effects.

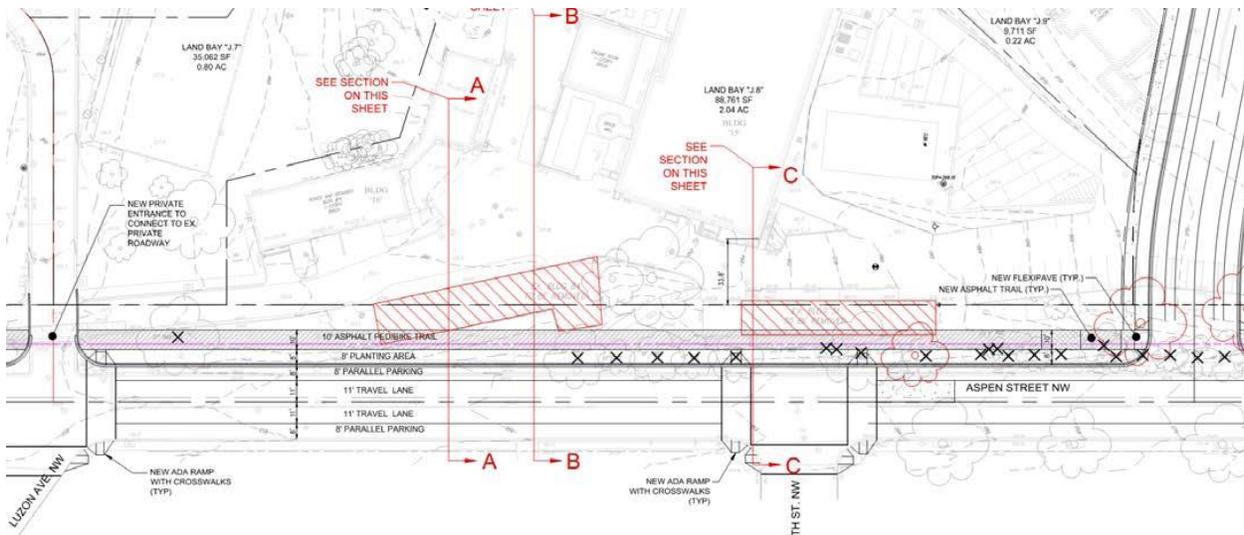
The law states that, “In those cases in which the Mayor finds that the demolition is necessary to allow the construction of a project of special merit, no demolition permit shall be issued unless a permit for new construction is issued simultaneously under section 3 of this act and the owner demonstrates the ability to complete the project” (D.C. Official Code § 6-1104(h)). This supposes a fully-fledged project.

In the case of Building 38, there is a project, albeit not fully developed. The small-area plan’s implied rationale for removing Building 38 was its replacement with a larger building. In reviewing the 2015 master plan, however, the Board supported the concept of altering some street widths and alignments, including those of 12th Street. The applicant’s presentation indicates that this realignment is reason for the demolition of this building, because a smoothly sloped and curved 12th Street running south from Dahlia would require considerable filling at the north end and rear of Building 38. Piling soil against its walls would certainly endanger the building, but there is the alternative of constructing retaining walls to avoid additional loads.





No application for a project has been submitted in relation to the proposed demolition of Buildings 31 and 84 either, but the same 2015 master-plan review touched upon a conceptual one. The applicant's presentation contains partial drawings for widening the Aspen Street right-of-way to provide a parking lane and a ten-foot-wide pedestrian and bike trail. It is HPO's understanding that the Department of Transportation does not wish to make additional design efforts without the assurance that such a proposal would be approved. But a ten-foot-wide trail separated from the street by an eight-foot planting buffer appears to be the DDOT preference.



There is no compelling reason why all interests cannot be served, and the Board was supportive of the trail idea in the master-plan review.¹ As the presentation illustrates, there seem to be available alternatives that would provide both parking and trail without disturbing the historic structures. As little as a two-foot alignment shift or narrowing of the trail could avoid Building 31. The west end of Building 84 extends further across the proposed trail alignment, but redirecting the path into the planting strip for a short stretch should not be fatal to the project.

It is important that this trail project be detailed, if not as a rationale for demolition, then at least so that the Board may evaluate all its effects. There would be no historic resources directly impacted beyond Buildings 31 and 84, but the topography across the campus necessitates a series of prominent retaining walls to support the trail from grades falling away into the campus or toward Aspen Street.

Recommendation

HPO recommends that the Board not approve preservation clearance of permit applications to raze Buildings 31, 38 and 84, because their demolition would not retain, enhance or adapt them, contrary to the purposes of the preservation law and incompatible with the character of the historic district.

¹ The October 29, 2015 staff report address the idea thus: “The site plans have changed in some ways from the small-area plan. A new Aspen Street entrance to the campus was previously intended to be opposite 13th Street in the city grid... and would have called for demolishing Buildings 31 and 84. That entrance is now proposed to be located farther east, between 13th Street and 13th Place, saving the two buildings from the impacts of the road... The present argument is that a widening of Aspen Street to accommodate more on-street parking and a pedestrian/bike trail would require the raze of these two structures, as they stand near the property line.... It is understood that the Department of Transportation (DDOT) does intend to undertake such road improvements, and the road plan illustrated may be based upon those intentions, but no specific proposal has been received by HPO prior to this application. Given the uneven topography along the southern edge of the campus, an ideal alignment of such a trail is not obvious, and it may be that a trail could avoid the buildings. Indeed, flipping the locations of the trail and the planting area, at least for a stretch, may well prove an easier project to construct, as a good deal of filling and retaining walls would be required to support the trail, the more so the farther into the campus it is situated.